

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

DAVID ADLER STAVELEY, a/k/a
"Kurt Sanborn," a/k/a "David
Sanborn"

Case No. 1:20-MJ-00034-LDA

FILED UNDER SEAL

**GOVERNMENT'S MOTION TO WITHDRAW ITS
MOTION FOR REVOCATION OF
RELEASE AND ORDER OF DETENTION**

The government respectfully moves this Court to withdraw the motion filed on May 9, 2020 to revoke defendant's bond and detain him pending trial. That motion was based on the reporting of a former girlfriend of defendant, C.P., who informed law enforcement that she felt harassed and intimidated by defendant following his arrest in this case. C.P. was particularly concerned with defendant's unplanned arrival at her house in Essex, Connecticut on May 8, 2020. Following the initial reports from C.P., the government was concerned for her safety and moved this Court to revoke defendant's bail.

Following the filing of the motion for revocation, the government had additional conversations with C.P. and was provided with numerous text messages between C.P. and the defendant. While the government understands C.P.'s concerns, they appear to be based primarily on publicly available reporting of defendant's prior conduct. Although defendant did send C.P. numerous text messages following his arrest and

showed up at her house uninvited on May 8, there is insufficient evidence to prove that defendant acted in an objectively intimidating or harassing manner toward C.P.

Accordingly, the government respectfully moves to withdraw its motion to revoke defendant's bail. The government intends to file shortly a new motion to modify defendant's release conditions to include home confinement with electronic monitoring based on defendant's unauthorized trip to Connecticut.

Respectfully submitted,

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CERTIFICATION OF SERVICE

On this 11th day of May, 2020, I caused the within Government's Motion to Withdraw to be filed electronically and it is available for viewing and downloading from the ECF system.



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